

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*, §  
§  
Plaintiffs, §  
§  
v. § Case No. 1:18-CV-68  
§  
UNITED STATES OF AMERICA, *et al.*, §  
§  
Defendants, §  
§  
and §  
§  
KARLA PEREZ, *et al.*, §  
§  
Defendant-Intervenors, §  
§  
and §  
§  
STATE OF NEW JERSEY, §  
§  
Defendant-Intervenor. §

**DEFENDANT-INTERVENORS'  
MOTION TO WITHDRAW CELINA MORENO AS COUNSEL**

Defendant-Intervenors Karla Perez, *et al.*, respectfully move to withdraw Celina Moreno as an attorney in this case. Ms. Moreno resigned her employment with the Mexican American Legal Defense and Educational Fund (MALDEF), and is no longer employed by MALDEF. Her withdrawal will not cause undue delay and will not adversely affect the interests of Defendant-Intervenors Karla Perez, *et al.*

Defendant-Intervenors Karla Perez, *et al.*, will continue to be represented by Attorney-in-charge, Nina Perales, and attorneys Jack Salmon, Alejandra Avila, Ernest Herrera, Denise Hulett,

Priscila Orta (MALDEF), Douglas H. Hallward-Driemeier (Ropes & Gray), Carlos Moctezuma García (García & García Law Firm).

For these reasons, Defendant-Intervenors Karla Perez, *et al.*, respectfully request leave to withdrawal Celina Moreno as counsel in this case.

Dated: December 5, 2018

Respectfully Submitted

**MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales  
Nina Perales (Tex. Bar No. 24005046);  
(SD of Tex. Bar No. 21127)  
Attorney-in-Charge  
Jack Salmon (Tex. Bar No. 24068914)  
(SD of Texas Bar No. 1130532)  
Alejandra Ávila (Tex. Bar No. 24089252)  
(SD of Tex. Bar No. 2677912)  
Ernest I. Herrera (Tex. Bar No. 24094718);  
(SD of Tex. Bar No. 2462211)  
110 Broadway, Suite 300  
San Antonio, Texas 78205  
Phone: (210) 224-5476  
Facsimile: (210) 224-5382  
Email: nperales@maldef.org

Denise Hulett  
Mexican American Legal Defense and  
Educational Fund  
1512 14th Street  
Sacramento, CA 95814  
Phone: (916) 444-3031  
Email: dhulett@maldef.org  
(Admitted pro hac vice)

Priscila Orta  
Mexican American Legal Defense and  
Educational Fund  
11 East Adams, Suite 700  
Chicago, IL 60603  
Tel: (312) 427-0701  
Email: porta@maldef.org  
(Admitted pro hac vice)

**ROPES & GRAY LLP**  
Douglas H. Hallward-Driemeier  
2099 Pennsylvania Ave NW  
Washington, DC 20006-6807  
(202) 508-4600  
(202) 508-4776 (direct dial)  
Douglas.Hallward-  
Driemeier@ropesgray.com  
(Admitted pro hac vice)

**GARCÍA & GARCÍA,  
ATTORNEYS AT LAW P.L.L.C.**  
Carlos Moctezuma García  
(Tex. Bar No. 24065265)  
(SD of Tex. Bar No. 1081768)  
P.O. Box 4545  
McAllen, TX 78502  
Phone: (956) 630-3889  
Facsimile: (956) 630-3899  
Email: cgarcia@gaciagarcialaw.com

Attorneys for Defendant-Intervenors

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on December 5, 2018, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

*/s/ Jack Salmon*  
Jack Salmon

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*, §  
§  
Plaintiffs, §  
§  
v. § Case No. 1:18-CV-68  
§  
UNITED STATES OF AMERICA, *et al.*, §  
§  
Defendants, §  
§  
and §  
§  
KARLA PEREZ, *et al.*, §  
§  
Defendant-Intervenors, §  
§  
and §  
§  
STATE OF NEW JERSEY, §  
§  
Defendant-Intervenor. §

**ORDER**

On this date, the Court considered Defendant-Intervenors' Motion to Withdraw Celina Moreno as Counsel. After reviewing the arguments, the Motion to Withdraw is GRANTED. It is ORDERD that Celina Moreno is withdrawn as counsel of record for Defendant-Intervenors Karla Perez, *et al.* in this case. The Clerk is instructed to remove Ms. Moreno from further electronic notifications for this case.

Signed on \_\_\_\_\_, 2018.

---

HON. ANDREW S. HANEN  
UNITED STATES DISTRICT COURT JUDGE